From:	Dan.Gambetta
To:	Jeremy_Buck@fws.gov
Cc:	McMillan, James M NWP; ANDERSON Peter; Jonathan Freedman/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA; Inouye, Laura (ECY); LIVERMAN Alex; Cook, Marci E NWP
Subject:	Re: NWP-2007-195 SAP Draft Tech Memo
Date:	08/26/2009 12:21 PM

For non clean-up actions, like maintenance dredging, it will be
important for NMFS to have NSM sampled beforehand. Im not sure I
understand what the advantage is for having the NSM characterized after
the fact.

Dan

Jeremy_Buck@fws.gov wrote:
>
> I think it's a NMFS/State call as to whether they need the NSM layer
> characterized in the core beforehand. I would favor just doing it
> after, but understand if NMFS wants to get info on the NSM beforehand.
> I see the following options:
>
> 1) Sample the NSM in the core for the standard comparison as usual,
> and have the applicant take samples after dredging to meet superfund
> compliance for their records only (i.e., don't require any treatment
> other than what would be required based on the core sample results).
> Thus, the PRG would only be using the post dredge sample results only
> to forward to superfund folks, and to use to compare results annually
> overall, but not to have the applicant change anything after the
> fact). Since we all have faith that our existing sampling methods
> accurately characterizes what is in the dredge prism, then why would
> there be any difference between the NSM core and the samples collected
> post dredge anyway?
>
> 2) Don't do any characterization of the NSM using the cores, rely on
> just the post surface sampling and subsequent options for remedy if
> the NSM is greater than pre-dredge surface. If this is the option, I
> think we should have very good trigger values available so the
> applicant knows exactly what triggers additional actions they would
> need to take. In talking with some applicants, my sense is that they
> are less bothered by expenses involved in sampling than they are
> bothered by indecisiveness, uncertainty, and delays that sampling
> results tends to create. The greater certainty in decision making
> that we can give them up front, the more likely they will favor an
> option. Thus, for this option, I would also recommend sampling the
> existing surface decision unit and the post-dredge surface decision
> unit using a multi-increment approach so we can obtain better bounds
> on our trigger values.
>
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>
> *"McMillan, James M NWP" <James.M.McMillan@usace.army.mil>*
>
> 08/26/2009 09:45 AM
>
>
> To
> <Jeremy_Buck@fws.gov>, "ANDERSON Peter" <ANDERSON.Peter@deq.state.or.us>
> cc
> <Dan.Gambetta@noaa.gov>, "Inouye, Laura (ECY)" <Lino461@ECY.WA.GOV>,
> "LIVERMAN Alex" <liverman.alex@deq.state.or.us>, "Cook, Marci E NWP"
> <Marci.E.Cook@usace.army.mil>, <humphrey.chip@epa.gov>,
> <freedman.jonathan@epa.gov>
> Subject
> RE: NWP-2007-195 SAP Draft Tech Memo
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> Jeremy/Chip,
>
> So, are we looking at pre-dredge characterization of the projected new
> surface material (NSM) + residuals and then post dredge grab sampling and
> analysis of that as well?
>
> OR, are we eliminating the NSM analysis until after the dredging, are
> EPA and
> DEQ ok with leaving a potentially contaminated surface exposed until the
> results come back? Under this scenario, if the results came back w/
> elevated
> levels of PCBs or DDXs, then the applicant would need to further
> manage the
> contamination by either:
> 1) overdredging and covering with a sand, or
> 2) conducting additional sampling to determine if there is a "clean" layer
> below the proposed NSM that would be suitable for exposure to the water
> column (i.e., it's cleaner than the current surface).
>
> If no. 2 is the case, then we should be having our applicants sample
> up to 5'

> beneath their proposed NSM elevation, and archive the material for further
> analysis.
>
> Thanks for the clarification. Also, please be sure to keep Jonathan in the
> email chain for these projects since he is on the Portland District PRG.
>
> Thanks,
> JMc
>
> -----Original Message-----
> From: Jeremy_Buck@fws.gov [mailto:Jeremy_Buck@fws.gov]
> Sent: Wednesday, August 26, 2009 9:02 AM
> To: ANDERSON Peter
> Cc: Dan.Gambetta@noaa.gov; McMillan, James M NWP; Inouye, Laura (ECY);
> LIVERMAN Alex; Cook, Marci E NWP; humphrey.chip@epa.gov
> Subject: RE: NWP-2007-195 SAP Draft Tech Memo
>
>
> Chip and Eric have made recent comments to me that, at the very least,
> they
> want to see chemical analysis of surface sediments AFTER the dredging is
> completed for projects in the superfund site. Yes, that would mean the
> applicant would need to go back out and get new surface materials. I
> assume
> Chip would carry this message forward at any meetings he attends, but it
> might be something for the PRG to start thinking about how we would
> incorporate this request into the permit system. The Fish and Wildlife
> Service certainly supports this position, and I will add that this type of
> surface sediment information would be much more accurate (especially if
> collected in incremental fashion) than the current way we estimate new
> surface material, so it would greatly help analysis for listed species.
> But, it is after the fact, and would likely provide good information for
> future events or allow comparisons to be made to existing data. -Jeremy
>
>
>
>
> "ANDERSON Peter" <ANDERSON.Peter@deq.state.or.us>
>
> 08/26/2009 08:28 AM To
> "Inouye, Laura \(ECY\)" <Lino461@ECY.WA.GOV>, "McMillan, James M NWP"
> <James.M.McMillan@usace.army.mil>, <Dan.Gambetta@noaa.gov>
> cc
> <Jeremy_Buck@fws.gov>, "Cook, Marci E NWP" <Marci.E.Cook@usace.army.mil>,
> "LIVERMAN Alex" <liverman.alex@deq.state.or.us>
> Subject
> RE: NWP-2007-195 SAP Draft Tech Memo
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> Vigor Industrial is proposing to perform maintenance dredging at the
> Portland Ship Repair Yard (555 N. Channel Ave). A copy of this Tech Memo
> is currently under review by our Cleanup section. Like other projects
> located in the Portland Harbor area, the EPA is the lead agency for
> cleanup in water in the Superfund site, and it is necessary for them to
> actively participate in these dredging projects. Has the EPA made any
> comments?
>
> Thanks, Pete
>
>
> -----Original Message-----
> From: Inouye, Laura (ECY) [mailto:Lino461@ECY.WA.GOV]
> Sent: Tuesday, August 11, 2009 5:30 PM
> To: McMillan, James M NWP
> Cc: Jeremy_Buck@fws.gov; freedman.jonathan@epa.gov; ANDERSON Peter;
> Cook, Marci E NWP; Dan.Gambetta
> Subject: RE: NWP-2007-195 SAP Draft Tech Memo
>
> See embedded comments.
>
>
> -----Original Message-----
> From: Dan.Gambetta [mailto:Dan.Gambetta@noaa.gov]
> Sent: Tuesday, August 11, 2009 2:52 PM
> To: McMillan, James M NWP
> Cc: Inouye, Laura (ECY); Jeremy_Buck@fws.gov; freedman.jonathan@epa.gov;
> ANDERSON.Peter@deq.state.or.us; Cook, Marci E NWP
> Subject: Re: NWP-2007-195 SAP Draft Tech Memo
>
> Here are my comments, Vigor needs to sample the NSM and not make it
> conditional on dredge prism results.
>
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> McMillan, James M NWP wrote:
> >
> > Please review the attached Tech Memo. I've presented Vigor's proposed
> > sampling and ours as an option. Please pay particular attention to
> > Vigor's proposed composite approach and see if you think that is
> > appropriate.
> >
> > Thanks,
> > JMc
> >
> > James M. McMillan
> >
> > Sr. Regulatory Project Manager/

> >
> > Sediment Evaluation Specialist
> >
> > */U.S. Army Corps of Engineers/*
> > CENWP-0D-GP
> > 333 SW First Avenue, P.O. Box 2946
> > Portland, Oregon 97208-2946
> >
> > tel: 503.808.4376 fax: 503.808.4375
> >
> > <<NWP-2007-195 Vigor Industrial SAP Tech Memo.doc>>
> >
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